

This letter is draft for Commission review, comment and finalization, and is prepared for each of Nevada's Congressional delegation.

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Dear Senator:

On numerous occasions the Board of Wildlife Commissioners has expressed its concern over the management of wild horses and their negative affect on wildlife and the habitats they depend upon. Our comments are particularly significant at this time relative to H.R. 1018 and the proposed amendments to the Wild Free-Roaming Horse and Burro Act of 1971. It is important to once again underscore the impacts of unmanaged wild horse populations to Nevada's sensitive and threatened rangeland resource. We appreciate your attention to this ongoing problem and opposition to this bill.

Nevada is presently, with this year's foal crop, home to approximately 21,000 wild horses on public lands and over 3,000 horses in Bureau of Land Management (BLM) holding facilities and Nevada prison facilities. This represents nearly 60% of the wild horse population of the United States occurring on Nevada rangelands. Nevada, and therefore Nevada wildlife interests are clearly bearing the brunt of this proposed legislation. Nevada has worked diligently, and very patiently, with BLM to determine Appropriate Management Levels (AML) for some 103 Herd Management Areas (HMA) in the state. Currently, the estimated AML is approximately 12,600 horses for Nevada.

BLM reports approximately 31,000 wild horses are currently in holding facilities nationally. The anticipated impacts of implementing direction proposed in this legislation will only exacerbate the problem. The current maintenance costs associated with the care of these animals is significant and impacts the BLM fiscal capabilities for management of free roaming populations resulting in continuing degradation of Nevada's wildlife habitats.

Approximately two years ago, as a result of these management efforts, Nevada was closer than we have ever been to reaching established AML of horses on our public lands. However, with herd recruitment potentials at 25 percent per year, these recent accomplishments in population control have been lost. The reduced capability to remove excess horses from Nevada's rangelands and wildlife habitats and the recent determination by BLM that their own population census methodologies were underestimating wild horse populations has resulted in a realization that **wild horse numbers in Nevada are far from the established AML.**

As observed throughout the State, wild horse populations are not in balance with the land. Wild horses are ill-adapted to handle changes in the landscape, such as the long periods of drought common in the arid west and the devastating impacts of wildfires that have become common place. Drought conditions have resulted in wild horse die-offs in two areas of Nevada recently. The Nevada Test Range herd experienced a die-off of over 70 horses in 2007 and the Jackson Range herd lost 160 horses. Both of these events were as a result of drought and the resultant condition of

water holes and forage conditions. Another example of wild horse populations being out of balance with the existing habitat conditions is the number of emergency gathers implemented by BLM when wild fires have occurred.

The Nevada Board of Wildlife Commissioners has serious concerns regarding the measures proposed by HR 1018:

- HR 1018 would ban the use of aircraft which provides an efficient and humane capture method, the use of aircraft is commonly used in the capture of big game. Gathers using on-the ground methods, e.g. ATVs and /or horseback methods, would be much less effective and also present a significant safety risk to those conducting the operation. This would lead to less population control and exacerbate the already serious habitat competition issues so evident in Nevada.
- The Bill proposes to open many new areas for horse use. **These measures would lead to severe impacts to Nevada's wildlife populations.** These new areas are not vacant and unused. They are occupied by wildlife and livestock. Nevada's economy is in part dependent upon these uses which would suffer as horse numbers increase. **Expansion of the horse use areas as a means of diluting horse numbers is not a scientifically-proven method of management.** Considering wild horse reproductive rates and success wild horses would be expected to fill these new areas in a relative short time. **The proposed Bill has insufficient tools to manage areas of horse overpopulation.**
- The adoption program is able to help remove young or high quality horses but is unable to cope with the large and growing numbers of older, unadoptable horses. The Commissioners do support the need to develop new ideas to make this program successful, although it has never demonstrated to keep up with population increases.
- **We support the concept of resource allocation based upon the lands ability to provide support in the form of forage and water consistent with the mandate to "protect the natural ecological balance of all wildlife species"** which is exhibited in the BLM's program by the concept of Allowable Management Level (AML). Although the BLM has failed in their attempt to reach AML, wild horse gathers are working towards that goal. **BLM manages 103 wild horse management areas in Nevada now, adding to this will only spread the negative impacts occurring on Nevada wildlife habitats but also add significantly to the public costs required to keep horse numbers at levels consistent with the mandate for a natural ecological balance.**
- We support work on the development of a long-term (5+ years) injectable contraceptive. However, the current work with PZP has only delayed fertilization for a year or two and has resulted in a greater success level at producing viable offspring. Thus, it has not proven to be effective in controlling horse numbers.

That program would rely upon recapture for inoculation and the proposed Bill eliminates the use of aircraft, the most cost effective method for this effort.

In conclusion, the degradation to wildlife habitat and the entire rangeland resource must be halted. H.R. 1018 will only result in exacerbating the existing threats to Nevada's wildlife habitats and rangelands. We urge you to oppose HR1018 and any measures that would result in detrimental impacts to Nevada's wildlife. Please share our concerns with your fellow legislators.

Sincerely,

Dr. Gerald A. Lent, O.D.
Chairman

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